



United States Department of Justice

*United States Attorney
Northern District of New York*

100 South Clinton Street, P.O. Box 7198
James M. Hanley Federal Building
Syracuse, New York 13261-7198

Tel.: (315) 448-0672
Fax: (315) 448-0658

March 27, 2015

Hon. Elizabeth A. Wolford
U.S. District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

**Re: *United States v. Joseph Jenkins*
Criminal Action No.: 5:14-CR-88 (EAW)**

Dear Judge Wolford,

On March 25, 2015, the defendant filed Document 60 with the court. Please accept this letter as the Government's response. Mr. Jenkins complains that the government did not provide the defendant with copies of grand jury subpoenas as ordered. The government did provide the subpoenas and noted same in our certificate of service dated March 24, 2015, and noted at Document 59. Next, defendant maintains that recent government documents include new allegations that he falsely represented his income and assets. The defendant has not disclosed what "recent government documents" he is referencing, nor has he disclosed any basis for his suspicions. Without more information, we are not able to appropriately respond to his unsubstantiated speculation. The remaining claims of the defendant are claims previously made and addressed by this court or in the prior proceeding.

Enclosed herein are the three transcripts of the inmate telephone calls with the portions highlighted that the government intends to play during its case-in-chief. As the government previously represented at the pretrial conference, the government is not intending on playing each call in its entirety as there are portions of the calls that discuss specific aspects of the defendant's prior case.

Letter to Hon. Elizabeth A. Wolford
United States v. Joseph Jenkins
5:14-CR-88 (EAW)
March 27, 2015
Page 2

In response to the government's representation, the defendant indicated he objected to the government playing cut and edited versions of the phone calls. Should the defendant make that argument at trial, the government may seek to play each call in its entirety.

Respectfully,

RICHARD S. HARTUNIAN
United States Attorney

By: /s/ Tamara B. Thomson
Tamara B. Thomson
Assistant United States Attorney
Bar Roll No. 515310

Enclosures

cc: Joseph Jenkins, *pro se* (w/enclosures)
Randi Bianco, Esq. (w/enclosures)
ECF (w/o enclosures)

TBT/apk